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April 25, 2022

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Hernan Lopez*, Case No. 15-cr-252 (PKC)

Dear Judge Chen:

On behalf of Mr. Lopez, Mr. Martinez, and Full Play Group S.A., we write regarding our proposed juror questionnaire, which is attached to this letter. As the Court will note, Defendants Lopez, Martinez, and Full Play Group seek to add a limited set of questions to the questionnaire that Your Honor used in the 2017 trial, which primarily relate to the background and work experience of the potential jurors. The other narrative alterations are aimed at ensuring that the questionnaire is tailored to the allegations in this case, which are substantially narrower than those at issue in the prior trial, as the government's recent submissions make clear. (DE 1756; DE 1764).

The additional questions proposed by Defendants Lopez, Martinez, and Full Play Group are targeted to elicit relevant information from potential jurors who may have particular background knowledge, preconceptions, or biases about the events that relate to this case. They are appropriate lines of inquiry based on the nature of the case, the identity of the defendants, and the charges that will be presented to the jury. Including them in the questionnaire will therefore help speed up jury selection by providing relevant information to counsel about which jurors might properly be subject to the exercise of both challenges for cause and peremptory strikes.

Accordingly, Mr. Lopez, Mr. Martinez, and Full Play Group S.A. respectfully ask that the Court include these questions in the questionnaire; if the Court wishes to discuss the need for these questions further, counsel are happy to appear and address any concerns Your Honor might have.

Respectfully submitted,

/s/ David Sarratt

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John Gleeson
Sarah H. Wolf
Marisa R. Taney
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Hon. Pamela K. Chen

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April 25, 2022

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Hon. Pamela K. Chen

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April 25, 2022

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Counsel for Full Play Group S.A.

cc: All counsel of record (via ECF)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

Docket No. 15-CR-252 (S-3) (PKC)

HERNAN LOPEZ, CARLOS MARTINEZ
and FULL PLAY GROUP, SA,

Defendants.

----- X

THE HONORABLE PAMELA K. CHEN
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK

THIS PAGE IS THE QUESTIONNAIRE COVER SHEET.
PLEASE TEAR OFF THIS PAGE AND TAKE IT WITH YOU.

After submitting this form, please CALL the following telephone number on **XX-XX-2022 after XX:XX p.m.** Upon calling, you will receive instructions about the date on which you are to report back to court. It is extremely important that you know the juror number written on the top of this form when you make your call. Thank you.

Phone number: 1-800-587-6775

Date to call: **XX-XX-2022**

Time to call: **after XX:XX p.m.**

Juror #: _____

Instructions

The purpose of this questionnaire is to provide information to determine whether you can be a fair and impartial juror. Upon your oath or affirmation, you must give true and complete answers to every question. These questions are not meant to ask unnecessarily about personal matters. Rather, these questions will help the Court determine whether you can be fair and impartial in deciding this case and will also provide information about you as a juror to help the parties select a jury. Part of the selection process depends on your ability and promise to follow the law as it is explained by the Court. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

Where indicated, please check the space for “Yes” or “No” and, as requested, furnish answers, explanations, and/or details in the spaces provided. Please print your answers in blue or black ink. Please do not leave any questions unanswered. If you do not understand a particular question or do not know the answer, please write either “I do not understand,” or “I do not know” in the space provided for the answer. If there is not enough space for you to complete the answer to a question, please continue your answer in the margin next to the question or in the space provided at the end of the questionnaire. Do not write on the back of any page of the questionnaire. If you feel that a question does not apply to you, please write “N/A” in the space provided for the answer.

When you return to court, the Judge may ask specific questions about some of the information you provided in the questionnaire. When these follow-up questions are asked, if there are any matters that you do not wish to discuss in open court, please indicate that on the questionnaire where asked about your wish for privacy so that arrangements can be made for you to discuss these matters privately.

All of your responses will remain confidential. Do not discuss the questions or answers with anyone, including your fellow jurors. It is extremely important that the answers be your own individual answers.

Jury service is one of the most important civic duties a citizen can be called on to perform. You will be fulfilling your civic duty by responding completely and honestly during jury selection. Your participation in this process is greatly appreciated.

Juror #: _____

Case Information

This is a criminal case. Hernan Lopez, Carlos Martinez, and sports marketing company Full Play Group, SA (“Full Play”) are defendants who have each been charged in a document called an indictment in the Eastern District of New York with various crimes related to the alleged bribery of officials of a soccer organization sometimes called CONMEBOL which organizes and runs certain Latin American soccer tournaments. Mr. Lopez, Mr. Martinez, and Full Play each denies these charges, has pleaded not guilty, and is presumed innocent unless, and until, the government proves beyond a reasonable doubt that they are guilty of the charges in the indictment. Mr. Lopez, Mr. Martinez, and Full Play are about to go to trial in this case, which is the reason why a jury is being selected. This is just a summary of the charges against them. The Court will instruct the jury as to the elements of the crimes charged and the applicable law at a more appropriate time during trial.

Juror #: _____

PLEASE PRINT LEGIBLY - PLEASE USE ONLY BLUE OR BLACK INK

Background

1. Name: _____
2. Age: _____
3. Gender: _____
4. County of Residence: _____ Years there: _____
5. Neighborhood of Residence: _____ Years there: _____
6. Where were you born? _____
7. Where were your parents born? _____
8. Where were you raised? _____
9. Have you ever lived outside the United States? ☐ Yes ☐ No
 - a. If yes, where and for how long?

10. In the past 5 years, have you traveled internationally? ☐ Yes ☐ No
 - a. If yes, when and where were your last 5 international trips?

11. Do you have any difficulty reading or understanding the English language?
☐ Yes ☐ No
12. Other than English, what languages do you speak? _____
 - a. If you speak any languages other than English, would you have any difficulty relying solely on a translator's translation of that language? ☐ Yes ☐ No
13. Do you have any physical problem (for example, with your sight or hearing) that would interfere with your ability to serve on this jury? ☐ Yes ☐ No
 - a. If yes, please describe: _____

Juror #: _____

14. Marital status: [Circle one]

- a. Single
- b. Married
- c. Live with Partner
- d. Widow
- a. Divorced / Separated

15. How far did you go in school? [Circle one]

- a. Attended high school
- b. Graduated from high school
- c. Took some college classes/attended trade school
- d. Received an associate's degree _____ (area)
- e. Received a college degree _____ (major)
- f. Took graduate courses _____ (area)
- g. Received a graduate degree _____ (degree/area)

16. What is your current employment status? [Circle one]

- a. Working full-time
- b. Working part-time
- c. Self-employed
- d. Retired
- e. Unemployed
- f. Homemaker
- g. Disabled
- h. Full-time Student

17. List your current occupation and employer, or if not currently employed, your most recent occupation and employer.

- a. Employer: _____
- b. Position: _____

18. How long have you worked at your current job? _____

19. What are your job duties and responsibilities? _____

20. What other jobs have you had in your working life? _____

Juror #: _____

21. If married, living with a partner, or widowed, what is/was your spouse/partner's occupation or business?

22. Do you own your home, rent, or live with family or friends? [Circle one]

- a. Own
- b. Rent
- c. Live with Family/Friends

23. Please list any groups and/or organizations to which you belong, including professional, religious, political or hobby-related organizations:

Experiences and Beliefs

24. How do you get your news? Please identify the names of any source(s) you use: [Fill in all that apply]

- a. Newspapers: _____
- b. Radio (includes talk radio): _____
- c. Podcast: _____
- d. Television or Cable News: _____
- e. Internet: _____
- f. Social Media: _____

25. How often do you make it a point to follow the news? [Circle one]

- a. Everyday
- b. Almost everyday
- c. Several times a week
- d. Several times a month
- e. Never

26. Do you watch any legal or courtroom TV shows (*i.e.*, Law & Order, The Good Wife, Suits, etc.)? ☐ Yes ☐ No

Juror #: _____

- a. If yes, please list the shows you watch: _____

27. Please indicate any prior service as a juror: [Check all that apply]

Juror in criminal case in federal or state court

Juror in civil case in federal or state court

Member of a grand jury in federal or state court

None

- a. If you served as a juror on a criminal or civil case, was the jury able to reach a verdict? (Do not state what the verdict was, only whether you were able to reach a verdict.) ☐ Yes ☐ No
- b. If you have any type of prior service as a juror, were you the foreperson on the jury? ☐ Yes ☐ No
- c. If you have any type of prior service as a juror, is there anything about your previous experience(s) that would make you want to serve or not serve on a jury again? ☐ Yes ☐ No

28. Have you, a family member, or close friend ever been a victim of or witness to a crime?

☐ Yes (self) ☐ Yes (friend/family) ☐ No

- a. If yes, please describe the circumstances surrounding the incident(s) and your relationship with the person involved.

- b. If yes, did law enforcement personnel respond appropriately?

29. Have you, a family member, or close friend ever been arrested, charged, or convicted of a crime other than routine traffic violations?

☐ Yes (self) ☐ Yes (friends/family) ☐ No

- a. If yes, please describe the circumstances surrounding the incident(s) and your relationship to the person(s) involved:

Juror #: _____

- b. If yes, do you believe that you or your family member or friend were fairly treated in connection with such matter? Why or why not?

- c. Would that experience affect your ability to be fair and impartial in this case?
☐ Yes ☐ No

30. Have you, a family member, or a close friend been involved in a lawsuit as a party or a witness? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

- a. If yes, please explain: _____

31. Have you ever served in any branch of the United States Armed Forces (*i.e.*, Marine Corps, Army, Navy, Air Force, Coast Guard, etc.)? ☐ Yes ☐ No

- a. If yes, please note the military branch and how long you were on active duty: _____

32. Have you, a family member, or friend ever worked in law enforcement (*e.g.*, police officer, detective, sheriff, etc.)? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

- a. If yes, please describe what you/they do/did: _____

- b. If this was a family member/friend, do you talk to them about their work in law enforcement? _____

33. Have you ever applied to work, or seriously considered working, in law enforcement?
☐ Yes ☐ No

- a. If yes, please explain: _____

34. Have you, a family member, or friend ever served as an official or employee of the U.S. Department of Justice, any of its components, such as the U.S. Attorney's Office, or any

Juror #: _____

other U.S. government agency? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

a. If yes, please describe what you/they do/did: _____

b. If this was a family member / friend, do you talk to them about their work?

35. Have you, a family member, or friend ever worked as part of the criminal justice system (e.g., judge, court personnel, probation officer, correction officer, etc.) or in criminal defense (e.g., attorney, paralegal, investigator, etc.)?

☐ Yes (self) ☐ Yes (friends/family) ☐ No

a. If yes, please describe what you/they do/did: _____

b. If this was a family member / friend, do you talk to them about their work?

36. Other than as set forth above, have you or anyone close to you ever had *any* training or work experience in the law, for example, as a judge, prosecutor, defense attorney, paralegal, legal secretary, court reporter, or any other position in a law-related field?

☐ Yes ☐ No

a. If yes, please describe what you did: _____

37. Do you know of any reason why you may be prejudiced for or against the Department of Justice? ☐ Yes ☐ No

a. If yes, please explain: _____

38. Do you know of any reason why you may be prejudiced for or against the defendants?

☐ Yes ☐ No

a. If yes, please explain: _____

Juror #: _____

39. Mr. Lopez, Mr. Martinez, and representatives for Full Play are native Spanish speakers. Mr. Martinez and representatives of Full Play will use a translator during the trial. Will their use of a translator cause you to be prejudiced for or against the defendants?

☐ Yes ☐ No

a. If yes, please explain: _____

40. Some of the witnesses in this case may be federal agents or other law enforcement officials. Would you be inclined to believe a witness more because of his or her employment in law enforcement?

☐ Yes ☐ No

a. If yes, please explain: _____

41. Do you have any background, training, or experience in drafting, negotiating, or bidding on contracts?

☐ Yes ☐ No

a. If yes, please explain: _____

42. Do you or anyone close to you have any background, training, or experience in public relations, entertainment, or any media-related industry (*i.e.*, broadcasting, television, radio)? ☐ Yes ☐ No

a. If yes, please explain: _____

- b. If yes, did your background, training, or experience include broadcasting / marketing rights? ☐ Yes ☐ No

43. If yes, please explain: _____

Do you have any background, training, or experience related to professional sports?

☐ Yes ☐ No

Juror #: _____

a. If yes, please explain: _____

44. Have you, or any relative or close friend, taken any courses or had any background, training, or experience in finance, accounting, auditing, bookkeeping, or compliance?

☐ Yes (self) ☐ Yes (family/close friend) ☐ No

a. If yes, please explain: _____

45. Have you ever worked for a large corporation? ☐ Yes ☐ No

a. If yes, please note when, for what company, and what position(s) you held:

46. Have you ever worked for a nonprofit organization, or a foreign or international corporation or organization? ☐ Yes ☐ No

a. If yes, please note when, for what entity, and what position(s) you held:

47. Have you ever held a managerial / leadership position in any company or organization?

☐ Yes ☐ No

a. If yes, was this a high ranking executive role (*i.e.*, CEO, COO)?

☐ Yes ☐ No

b. If yes, please note when, for what company, and what position(s) you held:

c. What is the largest number of employees you have supervised at one time?

d. Approximately how many employees were at the company?

48. Have you ever worked for a company or organization where your position required you to be aware of certain regulatory rules / laws or compliance regulations or standards?

☐ Yes ☐ No

a. If yes, were you ever in charge of enforcing those rules / laws / regulations / standards? ☐ Yes ☐ No

Juror #: _____

i. If yes, please explain: _____

49. Have you ever worked at a company or organization which had an internal compliance department? ☐ Yes ☐ No

a. If yes, did you ever work within that department? ☐ Yes ☐ No

b. If yes, please describe your role and responsibilities within the department: _____

50. Have you ever reported a violation or filed a complaint of unethical / unlawful behavior to a compliance department, ethics boards, human resources, or any other related department? ☐ Yes ☐ No

a. If yes, was the complaint investigated: _____

51. Were you satisfied with the outcome? ☐ Yes ☐ No

52. Have you worked at a company where there have been allegations of wrongdoing by corporate executives or department heads? ☐ Yes ☐ No

a. If yes, please explain: _____

53. Are you interested in or involved with the sport of soccer (for example, playing, coaching or watching)? ☐ Yes ☐ No

a. If yes, how closely do you watch and follow soccer? _____

54. Is there anything in your personal experience or anything about your beliefs or values that has not been covered in this questionnaire but which might affect your ability to judge the facts and provide a fair verdict in this case?

☐ Yes ☐ No

Juror #: _____

Knowledge of the Trial Participants

55. The case for which you are summoned involves three defendants: Hernan Lopez, Carlos Martinez, and Full Play.

a. Are you familiar with Hernan Lopez or any of his family members? ☐ Yes ☐ No

i. If yes, please explain:

b. Are you familiar with Carlos Martinez or any of his family members?
☐ Yes ☐ No

i. If yes, please explain:

c. Are you familiar with Full Play or any of its executives, including Hugo Jinkis and Mariano Jinkis, and the current president, Carlos Fascetto? ☐ Yes ☐ No

i. If yes, please explain:

56. The judge presiding over this case is U.S. District Court Judge Pamela K. Chen. Do you know or are you familiar with Judge Chen or any member of her staff?

☐ Yes ☐ No

a. If yes, whom do you know and how do you know him/her/them?

57. Have you previously participated in any proceedings in the U.S. District Court for the Eastern District of New York in any capacity?

☐ Yes ☐ No

Juror #: _____

- a. If yes, approximately when and under what circumstances?

58. Please review the list attached to this questionnaire (Attachment A) that provides the names of entities and persons whom you may hear about during the trial. Do you know or have any connection with any of the listed individuals or entities? ☐ Yes ☐ No

- a. If yes, please explain: _____

Knowledge of the Case

You may have heard and/or read something about the case at some time. There is nothing wrong with having heard/read something about this case. It is important that you truthfully and fully answer the following questions concerning your knowledge about this case through the media or any other source.

59. This case involves alleged bribes paid to officers of a South American soccer federation in exchange for media rights for certain soccer tournaments. Have you heard or read anything about the facts of this case, other than what you have heard in court today?

☐ Yes ☐ No

60. CONMEBOL is the governing body of soccer in South America. Before today, had you heard or read anything about charges involving the alleged bribery of CONMEBOL employees in relation to Latin American soccer tournaments?

☐ Yes ☐ No

- a. If yes, please describe what you have read or heard: _____

Juror #: _____

- b. If yes, please describe the amount of media coverage you have seen about this case. [Circle one]
- i. None (have not heard of this case before today)
 - ii. A little (basically just heard that it exists)
 - iii. A moderate amount (just basic coverage in the news)
 - iv. A lot (sought out and read many articles and / or watched account on TV or online)
- c. Have you ever commented on this case in a blog post, article, social media, or any other forum? ☐ Yes ☐ No

i. If yes, what did you comment? _____

61. The Judge will instruct you that you may draw no inference against the defendants from the fact that they have been indicted. The defendants are presumed innocent and the government must prove the guilt of the defendants beyond a reasonable doubt. The defendants have an absolute right not to testify in their defense or present any witnesses, and their silence may not be used against them. This is because the government has the burden of proving each and every element of its case beyond a reasonable doubt and that burden never shifts to the defendants. Can you follow this instruction? ☐ Yes ☐ No

a. If no, please explain: _____

62. If so, do you think what you have read or heard would affect your ability to be fair and impartial, and how so? ☐ Yes ☐ No

a. If no, please explain: _____

63. Do you feel that you will be able to weigh the credibility of testifying witnesses and determine which testimony to believe and which not to believe? ☐ Yes ☐ No

a. If no, please explain: _____

Juror #: _____

64. Do you have any specialized knowledge about how soccer tournaments are run or operated? ☐ Yes ☐ No

a. If yes, please explain: _____

65. Are you familiar with Fox International Channels (“FIC”), a business that is now owned by Disney and was formerly a subsidiary of Twenty-First Century Fox, Inc.? ☐ Yes ☐ No

a. If yes, please explain: _____

66. Do you have an opinion of FIC, Disney, or Twenty-First Century Fox, Inc. that would cause you to be prejudiced for or against the defendants?

a. If yes, please explain: _____

67. In your opinion, is there anything else, whether about this case, the issues, or the people involved in this case, that would prevent you from being an impartial juror?

☐ Yes ☐ No

a. If yes, please describe: _____

Legal Principles

68. The United States has the burden of proving the defendant’s guilt beyond a reasonable doubt. This burden never shifts to the defendant. The defendant is presumed innocent and cannot be found guilty unless the jury, unanimously and based solely on the evidence in this case, decides that his guilt has been proven beyond a reasonable doubt. Will you accept and apply this rule of law? ☐ Yes ☐ No

Juror #: _____

a. If no, please explain: _____

69. Under the law, a defendant need not offer any evidence on his or her behalf. If a defendant chooses not to offer any evidence, the jury is not permitted to consider that fact in any way in reaching a decision as to whether a defendant has been proven guilty. Will you accept and apply these rules of law? ☐ Yes ☐ No

a. If no, please explain: _____

70. The law also provides that under the Constitution, a person accused of a crime does not need to testify in his defense. If a defendant does not testify in his defense, you may not use his silence against him. Will you accept and apply this rule of law?

☐ Yes ☐ No

a. If no, please explain: _____

71. Some of the witnesses in this case may be individuals who were involved in crimes themselves, including the offenses charged against the defendants. They would testify pursuant to an agreement with the government. Is there anything that will prevent you from evaluating their testimony fairly and impartially in accordance with the Judge's instructions? ☐ Yes ☐ No

a. If yes, please explain: _____

72. Under the law, the facts are for the jury to determine and the law is for the judge to determine. At the conclusion of the case, the judge will instruct you on the law. You are required to accept the law as the judge explains it to you, even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Will you accept and apply this rule of law? ☐ Yes ☐ No

a. If no, please explain: _____

73. If you were selected to serve on this jury, would you consider and respect the view of the other jurors even if their views differed from yours, in accordance with the Court's instructions? ☐ Yes ☐ No

Juror #: _____

a. If no, please explain: _____

74. Do you understand that this burden includes proving each individual element of the crimes charged beyond a reasonable doubt, and until the prosecution does so, you must presume that the defendants are innocent of the charged offenses? ☐ Yes ☐ No

a. If no, please explain: _____

75. Do you understand that in order to find defendants guilty, you must find that they acted intentionally, meaning that you are satisfied beyond a reasonable doubt that the defendant acted deliberately and purposefully? ☐ Yes ☐ No

a. If no, please explain: _____

76. Are you able to analyze the facts and evidence put forth without letting bias, prejudice, or sympathy play any role in your deliberations? ☐ Yes ☐ No

a. If no, please explain: _____

77. This case may receive attention in the media, including in the newspaper, on television, on the radio and over the Internet. The judge will instruct you that you are not to read, watch or listen to such media. Under the law, you are to base your decision on the evidence presented at trial, not on what is reported in the media. Will you have any difficulty accepting the proposition that the only evidence you should consider is the evidence received in this courtroom and that you are to avoid and ignore any statements made by the media? ☐ Yes ☐ No

a. If no, please explain: _____

78. Are there any questions that you would prefer to discuss privately? If so, please indicate the question numbers here: _____

Juror #: _____

Scheduling And Ability To Serve

79. This trial is scheduled to begin May 23, 2022, and is expected to last approximately five to six weeks. The end of the sixth week is July 1, 2022. The trial will not take place on the Monday, May 30 (Memorial Day) and Monday, June 20 (Juneteenth National Independence Day). Is there an important reason why you could not serve on a jury for this period of time? The Court will sit on XXX. The trial day will be from X:XX a.m. to X:XX p.m. ☐ Yes ☐ No

a. If yes, please explain: _____

80. Is there anything (for example, health, job, family obligations, etc.) that would interfere with your ability to serve as a juror in this case? ☐ Yes ☐ No

a. If yes, please explain: _____

81. Do you have any difficulty with your eyesight or hearing? ☐ Yes ☐ No

a. If yes, please explain: _____

82. Will you be paid your salary while you serve jury duty?

☐ Yes ☐ No ☐ Not sure

83. This questionnaire has tried to direct your attention to things that may affect your ability to be a fair and impartial juror. Apart from any prior question, is there any fact, circumstance, opinion, or experience that would affect your ability to render a fair and impartial verdict? ☐ Yes ☐ No

a. If yes, please explain: _____

Juror #: _____

UNITED STATES v. HERNAN LOPEZ, CARLOS MARTINEZ
AND FULL PLAY GROUP, SA
Cr. No. 15-CR-252 (S-3) (PKC)

ATTACHMENT A:

**Names of People Who Might Testify or Who Might Be Discussed During Trial and
Names of Places That Might Be Discussed During Trial**

*Please circle the name of any person or place listed below that you
know or with which you have any connection.*

A. Defendants

1. Hernan Lopez
2. Carlos Martinez
3. Full Play Group

B. Defense Team Seated at Defendants' Table

[Placeholder]

C. Government Team Seated at Government's Table

[Placeholder]

D. Possible Witnesses and Other Names

[Placeholder]

E. Entities and Organizations

[Placeholder]

Juror #: _____

ADDITIONAL COMMENT PAGE

(Please put the question number in front of your answer)

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.